

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DEAN MARINE & EXCAVATING, INC.
a Michigan corporation,

Plaintiff,

vs.

Case No.: 24-13244

Honorable: Laurie J. Michelson

THE VESSEL “HELENE” her engines,
tackle, machinery, appurtenances, and
apparel, etc. in rem., a vessel on the navigable
waterways of the United States of America,
DANIEL DEANE, an individual,
NICHOLSON TERMINAL & DOCK COMPANY,
a Michigan Corporation, FIRST OF AMERICA BANK
– SECURITY nka FIRST OF AMERICA BANK –
SOUTHEAST MICHIGAN, N.A., a Michigan Corporation,
and SHAMROCK CHARTERING CO. a Michigan Corporation

Defendants.

/

REQUEST FOR CLERK’S ENTRY OF DEFAULT

In accordance with Fed. R. Civ. P. 55(a), I request that a Clerk’s Entry of Default be entered against First America Bank – Security n/k/a First of America Bank – Southeast Michigan, N.A., for failure to plead or otherwise defend.

AFFIDAVIT:

1. The Summons and Complaint were served on February 3, 2025, by serving the Michigan Bureau of Commercial Services, Corporation Division, c/o Alexis Lupo, P.O. Box 300054, Lansing, MI 48909. See Proof of Service filed on

February 24, 2025 (ECF No. 15).

2. The Defendant has failed to plead or otherwise defend in accordance with Fed R. Civ. P. 12.

3. The Defendant is not an infant, incompetent person or member of the military service.

4. This statement is true and is signed under the penalty of perjury.

Respectfully submitted,

KOTZ SANGSTER WYSOCKI P.C.

/s/ Tyler P. Phillips

By: Jeffrey M. Sangster (P30791)

Tyler P. Phillips (P78280)

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Dated: March 4, 2025

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2025, I electronically served the Request for Clerk's Entry of Default using the ECF system, in accordance with the Court's Electronic Guidelines. Notice of Electronic Filing of this document will be sent to all parties by operation of the Court's electronic filing system. A copy has also been sent via United States First Class mail to Michigan Bureau of Commercial Services, Corporation Division, c/o Alexis Lupo, P.O. Box 300054, Lansing, MI 48909.

/s/ Tyler P. Phillips